UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 20 2012

Ms. Deborah A. S. Hoag, P.E.
Environmental Division Manager
City of Reading
815 Washington Street
Reading, Pennsylvania 19601-3690

Re: Pretreatment Program
NPDES No. PA0026549

Dear Ms. Hoag:

On September 25, 2012, EPA conducted a Field Audit Inspection at your facility. The main purpose of the inspection was to assess the procedures and techniques used by the City when samples are collected as part of the pretreatment program. A copy of the inspection report is enclosed for your use. Based on the report, there are no sampling issues that need to be addressed by the City.

If you have any questions regarding this matter, please contact me at 215-814-5790.

Sincerely,

John Lovell
Pretreatment Coordinator
NPDES Permits and Enforcement (3WP41)
Water Protection Division

cc: Maria Bebenek, PADEP Southcentral Region (w/enclosure)
Ron Furlan, PADEP Central Office (w/out enclosures)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

November 29, 2012

MEMORANDUM

SUBJECT: FAI Report – City of Reading Waterwater Treatment Plant

FROM: Garth N. Connor (3EC10)
Environmental Scientist, OECEJ - Philadelphia

TO: John Lovell (3WP41)
Pretreatment Coordinator, Office of Municipal Assistance

Attached you will find a copy of the Field Audit Inspection report for the City of Reading Wastewater Treatment Plant in Reading, Pennsylvania.

Should you have any questions regarding the attached, please feel free to contact this office at (215) 814-3209.

Attachment(s):

1. Clover Farms Compliance Summary
2. List of Industrial Users in Reading
3. Inspection Photographs

Field Audit Inspection
Final Report

Reading Wastewater Treatment Plant
815 Washington Street
Reading, PA 19601

Conducted
on
September 25, 2012
by
Garth N. Connor & Jose J. Jimenez

Inspection Summary

On September 25, 2012, at approximately 9:00 AM, EPA inspectors Garth Connor and Jose Jimenez arrived at the Reading Wastewater Treatment Plant (Reading WWTP or the Plant) and met Ms. Jackie Hendricks. The EPA inspectors presented their credentials to Ms. Hendricks. At the time of the inspection. Reading WWTP was undergoing a renovation by installing a 42-inch pipe under the river to connect the Plant with the 6 and the Canal Pumping Station. The Plant has a capacity to manage 28 million gallons, but can handle up to 50 million gallons during a heavy rainstorm.

The City of Reading's Pre-Treatment Program has had some serious enforcement issues over the last few years mainly with one of its industrial users, the Clover Farms Dairy (the Facility) operation located just outside of the city of Reading. This Facility is a milk processing plant, and has had chronic problems complying with some of its effluent limits, including both oil and grease and pH. The company is currently operating under a consent agreement with the City of Reading, but still struggles to stay in compliance and has an old equalization tank. The EPA inspectors visited the Facility with Ms Hendricks and Ms. Deborah Hoag, City of Reading's Utilities System Manager, met us at the facility's equalization tank. The EPA inspectors took a number of photographs of its wastewater operation, especially focusing on the equalization tank **(Attachment #3)**. The company currently does manually skimming by staff several times a day of its equalization tank in order to achieve compliance. The company has recently purchased an automated skimming system, which was on the ground near the equalization tank at the time of this inspection. Facility staff hoped to get the new skimming system installed and running properly as soon as possible. Ms. Hendricks mentioned that the Facility appears to need a more sophisticated treatment system, such as a Dissolved Air Flotation (DAF) system, in order to permanently solve their wastewater issues. The Facility appears reluctant to spend the necessary money to purchase and install a DAF treatment system, but they did at least purchase the new skimmer system and they believe that this will eliminate their compliance problems.

As a result of this Clover Farm compliance issue, the facility has occasionally been considered out of NPDES compliance by the City of Reading staff. See attached Compliance Summary (**Attachment #1**) which describes the facility's recent compliance history. Some quarters they've been out of compliance and some quarters they've been barely in compliance. Also attached is a copy of the IU list, which lists the name of each of the Industrial Users in Reading (**Attachment #2**). An "M" to the left of the facility name means a minor facility on this printout.

Another Industrial User of the Reading POTW , Crossroads Beverage, just started up in 2012. Crossroads Beverage began operation in April, 2012, and the first sampling by POTW staff was in June, 2012. Based on the records reviewed, this new facility seems to be in good shape and did not have any compliance issues at the time of this inspection.

Environmental Justice Issues

The City of Reading has a number of significant Environmental Justice issues. First, it was recently reported in the news that Reading has the highest poverty rate of any small city in the United States. Approximately 42% of the city's total population of 77,000 residents are currently living in poverty. Flint, Michigan was previously considered the poorest city at 40%, but a recent analysis of the 2010 census results enabled Reading to take over as the poorest small city. Currently only 9% of

its population has a college diploma, a sign of a "brain drain", young people raised in Reading are leaving the area when their education is completed.

Secondly, the city of Reading has a large minority population, and is approximately 58% Hispanic at this time. Demographic data received from the state of Pennsylvania shows a high rate of children under six with a elevated blood lead concentration. Reading has some of the highest blood lead levels in the entire state. This is especially a concern in Reading because recent census data show that over 12% of its population is children under the age of seven, the highest percentage for this age group of any city in Pennsylvania. The EPA inspectors did a driving tour of the city of Reading, and noticed a number of abandoned properties that were formerly industrial plants. For example, Glidden Paint is now closed and so is Dana Corp, a maker of truck chassis. A recent new release mentioned that Exide Battery is also about to close its manufacturing facility. It seems as if the city has lost quite a bit of its manufacturing base, and has a difficult time finding employment for a good portion of its population.

POTW PRETREATMENT PROGRAM FIELD AUDIT CHECKLIST

Audit Date	POTW Name
9/25/2012	Reading POTW

Contact Name	Title	Telephone
Ms. Jackie Hendricks	Pre-Treatment Coordinator – Retired Oct. 31, 2012	610-655-6131
Address	815 Washington Street Reading, PA 19601	

	Yes	No
Should this be the person on the mailing list? Jackie had 24 years of work experience at this facility, and is quite knowledgeable about pre-treatment.	X	

If no, complete the following for the person to be on the mailing list:

Name	Title	Telephone
Jeffrey Hill	Interim Pre-Treatment Coordinator	
Address	Same address and phone number as above. Mr. Hill was not present during inspection, but now is working as the new Pre-treatment coordinator.	

Participants				
	Name	Title	Organization	Telephone
1	Garth Connor	Inspector	EPA - OECEJ	215-814-3209
2	Jose Jimenez	Inspector	EPA - OECEJ	215-814-2148
3	Jackie Hendricks	Pre-Treatment Coord.	City of Reading	610-655-6131
4				
5				

A. Background - Complete prior to on site activity				
1	As required by the approved program, list frequency for:	CIU	SNIU	
	POTW sampling of IUs	4/year	4/year	
	POTW inspection of IUs	1/year	1/year	
	IU self-monitoring – **Varies, min. 2 or 4 times/year**	varies	varies	
	IU reporting – **Varies as described above.**	varies	varies	
2	In the last year, indicate frequency of:	CIU	SNIU	
	POTW sampling of IUs **(Minimum, some monthly)**	[illegible]	2/year	
	POTW inspection of IUs	1/year	1/year	
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain	**N/A, all done as required.**		
3	List all SIUs that were found to have been not sampled or not inspected at the last PCI or annual report **N/A, all done.**			

Name of IU	NS/NI/B	Reason	
N/A			
4 Does the annual report indicate any new CIUs? **Yes, Crossroads Beverage is a new IU.**	Yes	No	
	X		

B. POTW Sampling and Inspection				
1	List the SIUs that were either not sampled or not inspected in the last 12 months (403.8(f)(2)(v)):			
Name of IU	NS/NI/B	[illegible]		
2	Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample?	Yes	No	NA
		X		
	If so, how many grab samples are used?	One, sometimes two when justified.		
3	Are composite samples used for all other pollutants to evaluate compliance with:	Yes	No	NA
	Categorical standards?	X		
	Local limits?	X		
	Is any unannounced sampling conducted?	**yes**		
4	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	X		

5	How much time normally elapses between sample collection and obtaining analytical results?		**3 Days, some done in-house**	
6	Does POTW use QA/QC procedures such as:	Yes	No	NA
	Use of calibration and maintenance plan for sampling equipment?	X		
	Training for sampler? **Staff has approp. training**	X		
	Split samples (field)?	X		
	Training for analyst? **Ryder Labs is NELA certified**	X		
	Duplicate samples (laboratory)?	X		
	Method blanks (laboratory)?	X		
	Spiked samples (laboratory)?	X		

C. IU Self-Monitoring and Reporting

1	As currently conducted, list frequency for: N/A	CIU	SNIU	
	IU self-monitoring **Some twice/year, some quarterly**	varies	varies	
	IU reporting	varies	varies	
	If less than required by the approved program, explain			
2	If IUs sample more frequently than required, do they report all sampling results to the POTW (403.12(g)(5))?	Yes	No	NA
		X		
3	List all new source IUs: **Crossroads Bev.**			
	Have the following been received by all IUs which became new sources in the last 12 months (403.12))?	# received	# required	
	Baseline Monitoring Reports	X		
	Compliance Schedule Milestone Reports	X		
	90-day Final Compliance Reports	X		
	How does POTW verify the information in these reports?	If applicable, during inspections, etc.		
4	Do any IUs discharge hazardous waste?	Yes	No	
			X	
	If no, how does POTW verify this?	**Thru inspections & sampling by POTW staff.**		
	If yes, has the IU submitted the proper notifications (403.12(p))?	Yes	No	NA
				X

INDUSTRIAL USER FILE EVALUATION			
IU Name	Aramark Uniform Services		
Category	Industrial Laundry, SIC is 7218, SNIU	PWF	
Reg. Params.			
Address			
Comments			
IU Name	Clover Farms Dairy		
Category	Dairy processing operation, SNIU	PWF	
Reg. Params.			
Address			
Comments	EPA inspectors visited this problematic facility with Ms. Hendricks, see attachments.		
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			

NOTE: Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), or the appropriate number.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
A. Industrial User Characterization				Aramark
1. Is the IU categorical (CIU), significant non-categorical (SNIU) or other (O)?				SNIU
2. Is the IU properly categorized?				Y
B. Control Mechanism				
1. Does the file contain:				
• an updated control mechanism application and/or survey questionnaire?				Y
• a current control mechanism?				Y
• documentation of how control mechanism limits and requirements were established?				Y
2. Were local limits and/or categorical standards properly applied?				Y
3. If applicable, were production-based standards correctly applied?				Y
4. If applicable, was the combined wastestream formula correctly applied?				N/A
5. If applicable, were TTO requirements or alternatives correctly applied?				N/A
6. In the inspector's opinion, is the sample frequency sufficient to determine compliance?				Y
7. Does the control mechanism include:				
• sampling location and frequency?				Y
• sample type?				Y
8. Is the permit effective for 5 years or less? 3 year permits				Y
C. POTW Inspections of IUs				
1. How many POTW inspections were conducted and documented in the last 12 months?				1
2. Does the inspection report include:				
• inspector name? Jackie Hendricks				Y
• inspection date/time? Oct. 6, 2012				Y
• name of IU official contacted? Bob Ritter				Y

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
• review of manufacturing facilities?				Y
• verification of production data if needed?				N/A
• identification of wastewater sources, flow and types of discharge?				Y
• condition of pretreatment facilities?				Y
• evaluation of chemical storage areas?				Y
• evaluation of need for spill/slug control plan at least every 2 years?				Y
• evaluation of spill/slug control procedures?				Y
• evaluation of housekeeping practices?				Y
• evaluation of potential for hazardous waste discharge?				Y
• evaluation of self-monitoring equipment and techniques?				Y
• evaluation of lab procedures?				Y
• evaluation of monitoring records?				Y
D. POTW Sampling of IUs				
1. How many sampling visits were conducted and documented in the last 12 months? Quarterly sampling in past by Jeff Hill, then a lab technician, now the Interim Pre-treatment Coordinator.				4
2. Does the sampling documentation include:				
• name of sampling personnel?				Y
• sample date/time?				Y
• sample type?				Y
• sample location?				Y
• wastewater flow during sampling?				Y
• sample preservation?				Y
• chain of custody?				Y
• analytical methods used?				Y
• analysis date?				Y
• name of analyst?				Y
• all analytical data?				Y
3. Were all regulated parameters monitored?				Y

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
4. Were 40 CFR 136 analytical methods used?				Y
E. IU Self-Monitoring and Reporting				
1. Has the IU submitted all required self-monitoring reports in the last 12 months?				Y
2. Were all regulated parameters monitored at the required frequency?				Y
F. Slug/Spill Control				
1. Have any slugs/spills been documented in the file?				N
2. Did the POTW require development of a slug/spill control plan?				Y
3. Has the IU developed a slug/spill control plan?				Y
4. Does the slug/spill plan contain:				
• description of discharge practices?				Y
• description of stored chemicals?				Y
• procedures to prevent slugs/spills?				Y
• procedures to notify POTW of slugs/spills?				Y
• follow-up practices to minimize damage from slugs/spills?				Y

Attachment #1 - Clover Farms Compliance Summary

Clover Farms Dairy
Nature of violation:
2nd Quarter – TRC violation of the oil/grease (HEM) limit listed in its permit
Actions planned and current compliance status:
A Consent Agreement with Clover Farms Dairy terminated on July 31, 2008. The agreement was for compliance with the oil and grease and pH limits in its permit. The company hired a consulting firm to work on the compliance issues. At the request of this firm, the agreement was written with two pathways to achieve compliance. These alternatives were equalization and pH adjustment or DAF technology. Each alternative had a separate termination date to achieve compliance. Segregation and hauling of wastewater high in oil and grease along with equalization and pH adjustment of the majority of the wastewater was chosen. The final compliance date for this approach was July 31, 2008. This Consent Agreement was signed on December 29, 2006.

The construction of this system did not return the company to compliance. It is possible that the sampling and testing studies conducted by the consulting firm were inaccurate. The design plans were based on these studies. The company continued its effort to divert additional waste streams to the segregation tank. Company engineers also made a number of modifications to the original system. None of these efforts were successful. In 2009 the company hired another engineering firm to design a building and DAF system. Subsequently, it hired a second firm to work on land development and zoning approvals from the township in which the company is located. The company met with township officials, the Planning Commission, and the Zoning Hearing Board. The City expected to write another Consent Order or Agreement in 2010 after the company had a better idea of how long the approvals would take and if there are any major impediments. Township approvals were responsible for some of the delays during the 2006 Consent Agreement. However, the company did not communicate with the City concerning a time schedule for completion of the project. The City continued to make contact with the company concerning its progress and the company indicated that it was still experiencing delays with the township. The company was in SNC for oil and grease for all four quarters in 2009 and 2010.

The City and the company test monthly for oil and grease. For the entire 2011 year, the company was in compliance with its oil and grease limit on self-monitoring testing. For the City testing, there were violations for the first six months of 2011. Beginning with July 2011, there were no violations for oil and grease on City testing. In December 2011, the City was asked to attend a meeting with the company's lawyer. No company representatives were in attendance. The lawyer wanted permission from the City to abandon plans for the DAF system because it found an alternative way to achieve compliance that would be much less expensive. The lawyer stated that the company is now manually skimming the equalization tank and this is the factor that has lead to compliance. The City requested additional information on the method being used to achieve compliance. A visit to the facility was discussed. The City also stated that a more permanent method for pH control would still be needed as well as a sampling manhole. These would have been included in the DAF system plan. After the meeting, City officials decided to begin second and third shift sampling to confirm that compliance with the oil and grease limit is not limited to the day shift. This was begun in January 2012. In December 2011, the City already began additional oil and grease sampling during the day shift at Clover Farms Dairy because of the dramatic change in the number of violations in 2011.

In January 2012, a meeting was held with the company's authorized representative and the company's lawyer. Due to the company's compliance record with the manual skimming of the equalization tank twice a day, the company wants to cancel plans for the installation of a DAF system. In order to maximize the effect of skimming, the company is obtaining a quote to install an automatic skimmer in the equalization tank. The City stated again that a more permanent method for pH control would still be needed as well as a sampling manhole. The company stated that if the automatic skimmer is successful in controlling oil and grease, it would install a large pH adjustment tank after the equalization tank and a sampling manhole. If the skimmer is not successful, the company would install the DAF system which would require pH control and a sampling manhole would be installed. The City decided that the best way to handle this is through a COA. However, it was also decided that any COA would have to be approved by EPA since the Enforcement Branch of the EPA is conducting its own investigation of the company. Because of the history of non-compliance and the amount of time that has passed without a permanent solution, any COA written would not include any reduction in fines during the COA.

Prior to signing the 2006 Consent Agreement, the fine schedule was $1500 per occurrence for an oil and grease violation. For the duration of the Consent Agreement, the fine for any oil and grease violation was set at $500 per occurrence. This fine amount continued after the termination of the Consent Agreement on July 21, 2008. Beginning with the first quarter of 2009, the fine for any oil and grease violation was escalated in accordance with the City's Penalty Escalation Policy. The fine went from $500 to $1000 per occurrence in the first quarter of 2009. Since that time there were three additional escalations per occurrence. In the third quarter of 2009, the fine was increased to $1500. In the first quarter of 2010, the fine was increased to $2000. In the third quarter of 2010, the fine was increased to $2500. In the first quarter of 2011, the fine was increased to $3000. The fine remains at this amount since there have been no violations since July 2011.

Attachment #2 - List of The Industrial Users

M	Air Liquide
	Akzo Nobel
M	Akzo Nobel(R & D)
	Aramark Uniforms
	Bachman Pretzels
	Berks Packing
	Cartech
	Cloister Car Wash and Lube
	Clover Farms
	Crescent Brass
*	Crossroads Beverage
	CRYOVAC
M	Diesel Services
	Dairy Farmers of America
	ECP
	Exide Corp - SLI -1
	- SLI -2
	- Smelter
	Hofmann Industries
	Interstate-Intercorr
	International Foundry Supply
	Lentz Milling
	National/Yorgey's Cleaners
M	NGK Metals
	Orograin
	Packaging Corporation of A
M	Paragon Optical
M	Penske Truck Leasing
M	Pa Truck Centers
	Prizer Painter Stove Works
	Quadrant EEP
	Quaker Maid Meats
	Reading Truck Body
	INDUSTRY
	Reading Eagle
	Reading Plating & Polishing
	Reitech
M	Remcon Plastics
	Sealed Air
	St Jo Med Ctr Downtown
	Summit
	Sun Rich

* RELATIVELY NEW

M - MEANS MINOR

12 MUNICIPALITIES
(SOME OUTSIDE OF READING
LIKE WYOMISSING + MOUNT PENN)

* GRAY IN CITY OF READING

CLOVER FARMS - HAS A CONSULTANT
CONSENT ORDER, PROBLEMS FOR ABOUT 10 YEARS.
SCHEDULE + DEADLINE

SEGREGATION
OIL + GREASE IS 100 mg/liter

NEW SIU -
* CROSSROADS BEVERAGE
(APRIL, 2012 - START-UP
JUNE - FIRST SAMPLING

NEAR CITY HALL

ARAMARK FILE
MOSTLY LATIONS WORKFORCE
DISCHARGE #14G

Sweet Streets
Termaco USA — RELATIVELY NEW
Tom Sturgis Pretzels
M Ultra Wash
M Unique Pretzels
United Cornstack
M Van Bennett Foods
M WORLD electronics
Yuasa, Inc.
BATTERY PLANT
MOTORCYCLE

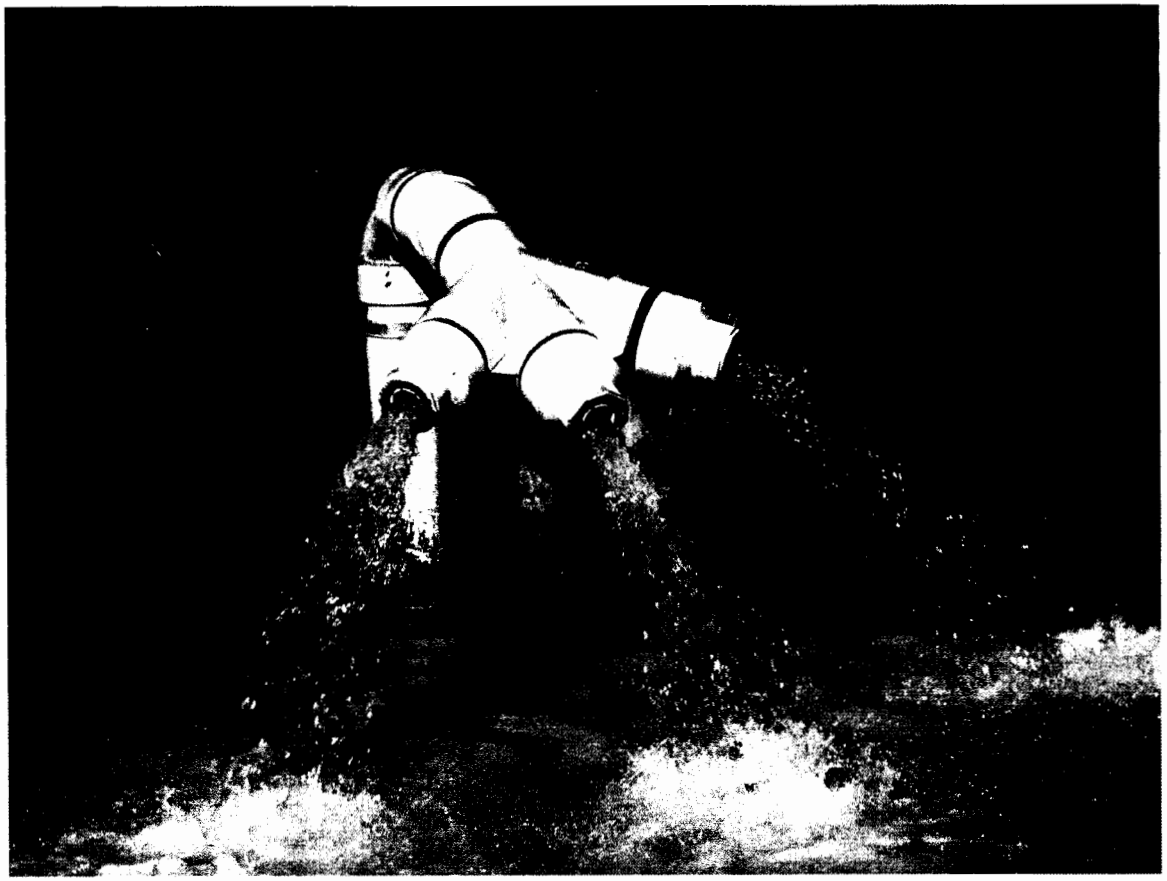
Attachment #3 - Inspection Photographs

Photograph #1 – Equalization Tank at Clover Farms

Wastewater enters tank from white pipes, surface is manually skimmed by staff several times a day.

Photograph #2 – Solids on Surface of Tank

This photograph shows the solids building up on the surface of the neutralization tank. More frequent skimming with automated equipment will hopefully reduce their compliance problems.



Photograph #3 – Close-up View of Discharge Pipes

This photograph shows the wastewater entering the tank in a close-up view.